

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

RYAN DEVEREAUX, et al.,

Plaintiffs,

vs.

COUNTY OF ST. LOUIS, MISSOURI,
et al.

Defendants.

Civil Action No. 4:15-cv-00553-RWS

**MEMORANDUM IN SUPPORT OF MOTION TO STAY CASE MANAGEMENT
DEADLINES**

Pursuant to Rule 16(b)(4) of the Federal Rules of Civil Procedure and Local Rule 16-6.05, Plaintiffs Ryan Devereaux, Lukas Hermsmeier, Ansgar Graw and Frank Herrmann (“Plaintiffs”) and St. Louis County, John Belmar, John Pfanstiel, Corey Zavorka, Justin Sparks, Matthew Hauck, Jason Dite, Jason Neuman, Matthew Taylor, Scott Miceli, Brian Ludwig, Jeffrey Feusting, Walter Davis, Nicholas Rebholz, Matthew Zufall, Brian Mccauley, Amy Dlugos and Marcial Amaro (“County Defendants”) move, for good cause to stay the current case management deadlines until March 15, 2016 and continue the ADR referral. As grounds therefore, Plaintiffs and the County Defendants state as follows:

1. Plaintiffs and the County Defendants made significant progress towards resolving this case in mediation on January 19, 2016.
2. It was clear during mediation, however, that further documentation would be necessary to resolve outstanding points of contention. Plaintiffs and the County Defendants are working diligently to gather, exchange, and review that documentation.

3. Plaintiffs and the County Defendants respectfully request that the Court stay the current discovery deadlines to allow the parties the opportunity to explore settlement without incurring additional discovery costs that may impede the ability to resolve this matter.

4. Plaintiffs and the County Defendants also note that because additional defendants have recently been served in this action, the current Case Management Schedule will likely have to be altered, in any event, in order to accommodate the new defendants.

5. Plaintiffs and the County Defendants ask that the current deadline be stayed until March 15, 2016. On or before March 15, 2016, Plaintiffs and the County Defendants shall submit a status report to the Court indicating whether or not the case has settled. If the case has not settled, Plaintiffs and the County Defendants shall further submit motion to amend the Case Management order along with a proposed schedule.

6. The Mediator assigned to this action is in agreement with this proposed course of action and has agreed to remain involved in the ongoing negotiations.

7. A conference call between the parties and the mediator is scheduled for February 11, 2016 at 11am.

For the foregoing reasons, it is respectfully requested that the Motion to Stay Case Management Deadlines be granted. A proposed Order is attached.

Respectfully submitted,

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